



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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Rec'd
7/8/05

REPLY TO THE ATTENTION OF

B-19J

Mr. David Navecky
Environmental Concerns
Surface Transportation Board
Case Control Unit
1925 K Street NW, Suite 500
Washington, DC 20423

Re: STB Finance Docket No. 34435, *Ameren Energy Generating Company - Construction and Operation Exemption – Coffeen and Walshville, Illinois*

Dear Mr. Navecky:

In accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (U.S. EPA) has reviewed an Environmental Assessment (EA) produced by the Surface Transportation Board in connection with the above-mentioned construction exemption. The EA discusses the proposed construction and operation of one of two rail lines in Montgomery and Bond Counties, Illinois.

Ameren Energy Generating Company (AEGC) is proposing to construct new rail line to connect AEGC's Coffeen Power Plant (Coffeen) with existing rail lines. Currently, Norfolk Southern Railway (NS) transports most of Coffeen's coal by way of trackage rights over a BNSF Railway Company (BNSF) line. Proposed construction would provide AEGC with alternative rail access and increased options for transporting coal. Even though the rail line would be utilized to transport mainly coal, the line would be operated as a common carrier rail line giving other shippers the ability to request rail service. Based on the information provided in the EA, we offer the following comments.

Alternatives

Two rail lines have been proposed. Route A would be a rail line starting at Coffeen and connecting to existing BNSF and Union Pacific Railroad Company (UP) lines. Route B would be a shorter line connecting from the existing NS line to an existing UP line. We concur with AEGC's preference to construct and operate Route B. However, because permission to utilize NS line in conjunction with the proposed Route B has not been secured, Route A may become the preferred alternative. In the event that Route B cannot be built, we would object to the construction of Route A without investigation of a northerly route from Coffeen to the existing UP line. Based on the aerial photography supplied with the EA, a northerly route may possibly impact less of the Shoal Creek watershed. Route A would produce higher impacts to residences,

farmland, wetlands, aquatic resources, and forested habitat than either Route B or a northerly route.

Construction

A list of mitigation measures was included in the EA. We would like to take this opportunity to recommend the following be added:

- Use of a weed-free, native seed mix in conjunction with fiber mats or straw mulch to prevent erosion;
- Incorporation of a monitoring and management program covering a minimum period of three years to ensure that any mitigatory activities are successful (e.g., percent ratio of living native vegetation to dead and/or non-native vegetation). This type of mitigatory activity would enhance aesthetics, provide much-needed habitat for species, and provide a buffer to absorb any herbicides that might be used in the right-of-way;
- Retention of some woody debris in forested areas to provide wildlife habitat. If woody debris cannot be left on site, we recommend the trees be mulched for residential or community use within the project area. Burning woody debris is not recommended due to the negative affects to air quality associated with this action;
- Incorporation of the specifics for a long-term maintenance protocol for culverts. Ideally, culvert maintenance should be planned at least once per season to prevent blockage and damaging floods. We recommend the use of culverts versus filling streams or straightening watercourses in order to reduce the negative effects to hydrology and habitat quality and quantity; and
- Equipment washing prior to entering and leaving a construction site to reduce the spread of non-native invasive species.

Mitigation

- Mitigation for wetland loss be conducted at one location in the same watershed where impacts will occur. We strongly suggest mitigation for forested habitat; this can be accomplished by planting a variety of native species at a 1:1 ratio adjacent to the wetland mitigation site to create a buffer. A list of tree species preferred by the Indiana bat can be obtained from the U.S. Fish and Wildlife Service.

We appreciate the opportunity to review the EA and hope this correspondence provides you with useful information. We look forward to receiving the STB's decision on this project. Should you have any questions, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or via e-mail at kowal.kathleen@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief
NEPA Implementation Section